

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**STIPULATION AND [PROPOSED] ORDER REGARDING
NON-PARTY OPEN RECALLS' FURTHER EXTENSION OF TIME
TO PRODUCE DOCUMENTS**

On December 6, 2018, the Court ordered non-party Generating Dealer Traffic, LLC d/b/a Open Recalls (“Open Recalls”) to produce documents responsive to the Rule 45 subpoena that Defendant CDK Global, LLC (“CDK”) served on Open Recalls. *See* Dkt. 462. The Court further instructed the parties to submit a stipulation stating any agreed upon extension of the December 21, 2018 deadline. *Id.*

On December 21, 2018, the parties stipulated to an extension of the deadline for Open Recalls to complete its production by January 11, 2019. *See* Dkt. 485, 486.

Pursuant to the Court’s orders, the parties hereby stipulate and agree that:

1. Open Recalls has requested a further two-week extension to January 25, 2019, in light of an absence for bereavement by the individual primarily responsible for preparing its additional productions.

2. In particular, Open Recalls represents that it is a small automotive software vendor that is largely solely run by its founder, Michael Korp. Mr. Korp’s father was in hospice care for much of December 2018 and passed away on January 1, 2019. The funeral is scheduled for this Saturday, January 12, 2019. Mr. Korp – who also started a new job very recently – has been

responsible for arranging and planning his father's funeral and other logistical matters. Although Mr. Korp has been working diligently to respond to Defendants' third-party subpoena – and has already identified and produced responsive documents – he has been unable to devote substantial time to that effort in recent weeks in light of the foregoing circumstances.

3. Defendants CDK and The Reynolds and Reynolds Company consent to Open Recalls' requested two-week extension. The parties do not anticipate any further extensions.

4. Open Recalls will produce any additional responsive documents on or before January 25, 2019.

SO ORDERED:

Magistrate Judge Jeffrey T. Gilbert

STIPULATED AND AGREED:

Dated: January 10, 2019

/s/ Derek T. Ho

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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on January 10, 2019, I caused a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER REGARDING NON-PARTY OPEN RECALLS' FURTHER EXTENSION OF TIME TO PRODUCE DOCUMENTS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho
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